

Sweet, J

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

FINANCIAL GUARANTY INSURANCE
COMPANY,

Plaintiff,

- against -

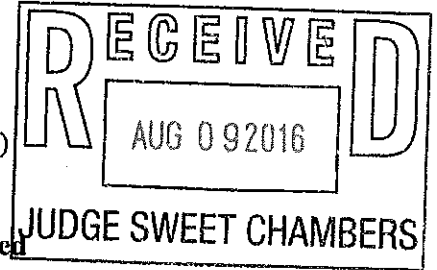
THE PUTNAM ADVISORY COMPANY, LLC,

Defendant.

12-cv-7372 (RWS)

ECF CASE
Electronically Filed

STIPULATION AND
[PROPOSED] SCHEDULING
ORDER



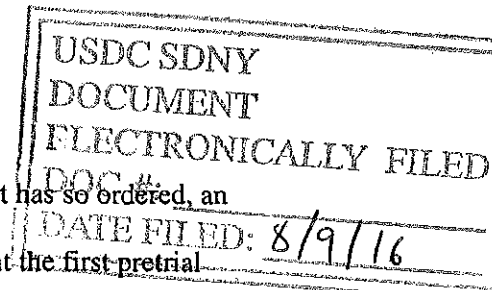
WHEREAS, the parties have previously stipulated to, and this Court has so ordered, an extension of the deadlines set forth in the schedule endorsed by this Court at the first pretrial conference (Dkt. No. 46) to facilitate the orderly completion of discovery; and

WHEREAS, the Stipulation and Scheduling Order in this action (Dkt. No. 64) sets a deadline for completion of party and third-party fact discovery of September 30, 2016, and a deadline for completion of expert discovery of January 31, 2017; and

WHEREAS, the parties agree that completion of party and third-party fact discovery by September 30, 2016 and expert discovery by January 31, 2017 is infeasible and that an extension of the deadlines set forth in the Stipulation and Scheduling Order is warranted; and

WHEREAS, the parties anticipate that scheduling and taking depositions, many of which will involve third-parties, will require a period of time beyond that necessary to complete document discovery; and

WHEREAS, the parties have once previously requested an extension of the discovery deadline in this action, which request was granted by this Court; and



WHEREAS, the requested extension will affect, and require adjournment of, the pretrial conference scheduled by order of this Court (Dkt. No. 67) for February 8, 2017 at 4:00 PM;

NOW, THEREFORE, it is hereby STIPULATED AND AGREED by and between the parties, through their undersigned counsel, and upon approval of the Court shall be deemed ORDERED, that:

1. The deadline for completion of party and third-party document discovery shall be December 30, 2016.
2. The deadline for completion of depositions shall be June 30, 2017.
3. The deadline for completion of expert discovery shall be October 31, 2017.
4. The pretrial conference shall be adjourned until such date as this Court deems appropriate.
5. This extension is without prejudice or waiver of the right of either party to seek leave of this Court for a further extension of any deadline hereby established.

DATED: August 5, 2016

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IT IS SO ORDERED:


_____, 2016
New York, New York



HONORABLE ROBERT W. SWEET
UNITED STATES DISTRICT JUDGE

